

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**TIMOTHY KELLY,
on behalf of himself and
all others similarly situated,**

Plaintiff,

v.

Civil Action No. 3:13cv311 (JAG)

NATIONSTAR MORTGAGE, LLC,

Defendant.

MEMORANDUM IN SUPPORT OF MOTION TO SEAL

Defendant Nationstar Mortgage, LLC (“Nationstar”), by counsel, hereby moves, pursuant to Local Rule of Civil Procedure 5 and the Stipulated Protective Order entered in this case (ECF No. 17), to seal Exhibit 5 and a portion of Exhibit 6 of Plaintiff’s Memorandum in Support of his Motion for Class Certification. In support of this motion, Nationstar states the following:

1. Plaintiff’s Memorandum in Support of his Motion for Class Certification was filed on March 3, 2014 (ECF Nos. 43 and 44).
2. Nationstar moves to seal Exhibit 5 and a portion of Exhibit 6 of Plaintiff’s Memorandum in Support of his Motion for Class Certification, because the documents contain confidential information, including proprietary business information that is commercially sensitive.
3. A redacted version of Exhibit 6 to Plaintiff’s Memorandum in Support of his Motion for Class Certification is attached hereto.
4. Nationstar will deliver Exhibit 5 and Exhibit 6 of Plaintiff’s Memorandum in Support of his Motion for Class Certification to the Clerk in a sealed container indicating case

number, case caption, the Order and Rule permitting the items to be filed under seal, and a non-confidential descriptive title of the document. *See* Local R. Civ. P. 5(E).

5. Attached hereto is a proposed order granting this Motion to Seal.

NATIONSTAR MORTGAGE, LLC

By: /s/ Jason E. Manning
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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